

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

UNITED STATES OF AMERICA

v.

CRIMINAL NO. 3:17cr140-DPJ-FKB

HEATHER ELIZABETH WRIGHT-BEARD

MOTION TO REVOKE BOND

The United States of America (hereafter “the government”) respectfully moves the Court, pursuant to 18 U.S.C. § 3148(b), to revoke the release of the defendant, HEATHER ELIZABETH WRIGHT-BEARD, and order the defendant detained. For reasons, the government states as follows:

1. The defendant was indicted by the federal grand jury on November 28, 2017. Dkt. No. 1.

2. The defendant signed an appearance bond on December 27, 2017, in which certain conditions were set by the Court. Dkt. No. 24.
3. In that bond, the defendant “agree[d] to follow every order of this court, or any court that considers this case.” Dkt. No. 24.
4. In its Order Setting Conditions of Release, this Court “ordered that the defendant’s release is subject to [several] conditions,” including “not violat[ing] federal, state, or local law while on release” and “appear[ing] in court as required.” Dkt. No. 23.
5. In its Order Setting Conditions of Release, this Court set additional conditions of release, including orders that the defendant must
 - a. “Avoid all contact, directly or indirectly, with any person who is or may be a victim or witness in the investigation or prosecution” and

- b. “Report as soon as possible, to the pretrial service office or supervising officer, every contact with law enforcement personnel.”

Dkt. No. 23.

- 6. The Court set the defendant’s trial for June 13, 2018, at 9 a.m.

Dkt. No. 39.

- 7. The government has reason to believe that the defendant violated the conditions of her bond and pretrial release in at least these ways:

- a. The defendant made contact with a potential witness, co-defendant David Calvin Beard, through a letter. In her letter, the defendant specifically addressed the fact that David Beard may testify at her trial; she also made statements regarding facts relevant to this case and about her preference for what she wanted him to say.

- b. The defendant has engaged in unlawful conduct, including seeking to recruit others to harm another person physically.
- c. The defendant has had contact with law enforcement and has not reported that contact with law enforcement.

8. The defendant stated, as recently as this week, that she would never go to jail and that, if found guilty at trial, she would flee.

Given the defendant's many violations of the terms of her supervised release and her stated intention to flee if found guilty at trial, the government requests that the defendant's appearance bond be revoked and that she be ordered detained pending the trial, or other resolution, of this case.

The government requests an expedited resolution of its motion.

Respectfully submitted,

D. MICHAEL HURST, JR.
*United States Attorney for the
Southern District of Mississippi*

KEESHA D. MIDDLETON
Assistant United States Attorney

/s/ *Jennifer Case*

JENNIFER CASE

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Dated: June 7, 2018

CERTIFICATE OF SERVICE

I hereby certify that on this day, I electronically filed the foregoing with the Clerk of the Court using the Electronic Case Filing system (ECF), which served to send notification of this filing to counsel of record.

Dated: June 7, 2018

/s/ *Jennifer Case*

JENNIFER CASE

Assistant United States Attorney